

2017 Sep-12 PM 02:43  
U.S. DISTRICT COURT  
N.D. OF ALABAMA

Pro Se 14 (Rev. 09/16) Complaint for Violation of Civil Rights (Prisoner)

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA

2017 SEP 12 A 11:18

U.S. DISTRICT COURT  
N.D. OF ALABAMAKeith Jusandto Taylor

Plaintiff

(Write your full name. No more than one plaintiff may be named in a complaint.)

-v-

Case No.

(to be filled in by the Clerk's Office)

29 Judicial Circuit  
Talladega Co. Alabama

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all of the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here. Your complaint may be brought in this court only if one or more of the named defendants is located within this district.)

1:17-cv-01552-MHH-TMP

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS  
(Prisoner Complaint)

## NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee of \$400.00 or an Application to Proceed *In Forma Pauperis*.

Mail the original complaint and the filing fee of \$400.00 or an Application to Proceed *In Forma Pauperis* to the Clerk of the United States District Court for the Northern District of Alabama, Room 140, Hugo L. Black U.S. Courthouse, 1729 5th Avenue North, Birmingham, Alabama 35203-2195.

**I. The Parties to this Complaint****A. The Plaintiff**

Provide the information below for the plaintiff named in the complaint.

Name Keith Tusandto Taylor  
 All other names by which  
 you have been known: Low Key  
 ID Number \_\_\_\_\_  
 Current Institution 261 Talladega Co. Jail  
 Address P.O. Box B  
Talladega Al 35161  
City State Zip Code

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name 29<sup>th</sup> Judicial Circuit Talladega Al.  
 Job or Title (*if known*) Prosecuting Agency  
 Shield Number \_\_\_\_\_  
 Employer Talladega Circuit Court  
 Address P.O. Box 6134  
Talladega Al. 35161  
City State Zip Code  
☐ Individual Capacity ☒ Official Capacity

Defendant No. 2

Name Sheriff Jimmy Kilgore  
 Job or Title (*if known*) Sheriff Talladega Co. Alabama  
 Shield Number not known  
 Employer Talladega County Alabama  
 Address P.O. Box 6134  
Talladega Al 35161  
City State Zip Code  
☒ Individual Capacity ☐ Official Capacity



- C. Plaintiffs suing under *Bivens* may only recover for violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

\_\_\_\_\_

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

\_\_\_\_\_

### III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (*check all that apply*):

- ☒ Pretrial Detainee  
☐ Civilly committed detainee  
☐ Immigration detainee  
☐ Convicted and sentenced state prisoner  
☐ Convicted and sentenced federal prisoner  
☐ Other \_\_\_\_\_  
 (explain)

### IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

*Between 2-13-14 and 9-9-2017  
 Between Federal prison Yazoo Miss and 29 Judicial  
 Circuit Trail At*

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

*Yes These events started @ Yazoo Fed  
 prison and Talladega Co Jail 9-9-2017*

C. What date and approximate time did the events giving rise to your claim(s) occur?

2-13-13 through 9-9-2017 at  
Talladega County Jail.

D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

All statements from co-defendants  
are different & b. No physical evidence  
only hearsay. Medical history  
proves non-involvement.

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries in detail.

Inadequate medical treatment  
Diagnosis of M.S.

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

1st and 2nd amendment  
rights violations. Failure to  
appoint council in a timely  
manner. Causing alibi witnesses  
to become vague or forgetful  
over.

Oppressive pretrial incarceration  
providing me w/ ineffective  
material in which to fight my  
case.

Due to Status Call court  
proceedings in 29 Judicial Circuit, defendant  
Mr. Taylor has found that  
Status Call proceedings are unconstitutional.

**VII. Exhaustion of Administrative Remedies Administrative Procedures**

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes

☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

FCC Yazoo City Miss., Tazadega Co jail.

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☒ Yes

☐ No

☐ Do not know

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☐ Yes

☒ No

☐ Do not know

If yes, which claim(s)?

---



---

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☒ Yes

☐ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☐ Yes

☐ No

- E. If you did file a grievance:

1. Where did you file the grievance?

~~Ø~~

2. What did you claim in your grievance?

~~Ø~~

3. What was the result, if any?

~~Ø~~

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. *(Describe all efforts to appeal to the highest level of the grievance process.)*

~~Ø~~



F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

*Grievance procedures do not pertain to Civil Rights Violations*

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

*Ø*

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

*Individual has confessed to said crime.  
Ineffective council to address said issues.*

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

#### VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had any cases dismissed based on grounds that it was frivolous, malicious, or failed to state a claim upon which relief may be granted?

☐ Yes

☒ No

If yes, state which court dismissed your case(s), when this occurred, and attach a copy of the order(s) if possible.

*Ø*



- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☒ No

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) Ø

Defendant(s) \_\_\_\_\_

2. Court (if federal court, name the district; if state court, name the county and State)

Ø

3. Docket or index number

Ø

4. Name of Judge assigned to your case

Ø

5. Approximate date of filing lawsuit

Ø

6. Is the case still pending?

☐ Yes

☒ No

If no, give the approximate date of disposition. Ø

7. What was the result of the case? (For example, Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

Ø

**IX. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.**

Printed Name of Plaintiff

Keith Jusando Taylor

Prison Identification #

22319-001

Prison Address

P.O. Box B

Tallahassee  
City

FL  
State

35161  
Zip Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

9-9-2017  
(Date)

Keith J Taylor  
Signature of Plaintiff

### 3 Elements on Civil Rights Violations

- (1) Defendant Keith Taylor on or about 9.28.15 at Court appearance asked Council at overall assessment of Discovery, and at no time has Council answered any questions pertaining to Case, and or Cases.
- (2) In the court in the 29 Judicial Circuit Talladega Alabama their Status Call Court Proceedings, are biased and unconstitutional and keep Defendant Blind and unprepared for any trial or court appearances therein, therefore violation of Keith Taylor's civil Rights are in direct violation.
- (3) An inadequate Private Investigator was hired by counsel and his reports have been inconsistent and poorly directed.  
Mr. Taylor's request for Mrs. Claudia Whitman was denied and a less thorough Investigator was put into play.